IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

	Plaintiff									
VS.					*	Ca	ise No:	8:17-cv	v-01098	B PX
COESTERVM	S.COM, I	NC.,	et al.	,	*					
Defendants					*					

MOTION TO SEAL MOTION TO WITHDRAW APPEARANCE OF COUNSEL

Pursuant to Local Rule 105.11, Defendant CoesterVMS.com., Inc. ("VMS"), by undersigned counsel, moves this Court to seal the Motion of Kenneth Frank (the "Motion") to Withdraw Appearance as Counsel for Defendant CoesterVMS.com, Inc. (ECF #90), and in support thereof states as follows:

- 1. The Motion contains highly sensitive and confidential information which if made public could have a material adverse effect on VMS.
- 2. Unreducted copies of the Motion and all exhibits were provided to all parties to this case and they will not be prejudiced if this Court's grants the Motion.
- 3. No public interest would be served by the disclosure of the contents of the Motion.

WHEREFORE, Defendant CoesterVMS.com, Inc, respectfully requests this Court grant this motion to seal, and permit the Motion to be filed and maintained under seal.

/s/Kenneth B. Frank Kenneth B. Frank (Bar # 04883) Kenneth B. Frank, PA 1808 Dixon Road Baltimore, Maryland 21209 kenny@kennyfrank.net Office: 443-345-2600

Cell: 443-691-3600

Counsel to CoesterVMS.com.Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of January 2019, copies of this Motion to Seal Motion to Withdraw Appearance of Counsel and exhibits thereto were served via electronic mail on all counsel of record.

/s/Kenneth B. Frank Kenneth B. Frank (Bar # 04883)